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August 23, 2019

VIA ECF AND HAND DELIVERY

Honorable Naomi Reice Buchwald
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *In re LIBOR-Based Financial Instruments Antitrust Litig.*,
No. 11 Civ. 2613 (NRB), Master File No. 1:11-md-2262-NRB

Dear Judge Buchwald:

We are interim co-lead counsel for the Exchange-Based Plaintiffs (“Plaintiffs”) in the above-referenced action and respectfully submit this letter in connection with Plaintiffs’ pending motions for preliminary approval of six settlements (ECF Nos. 2307-1, 2728-1), Plaintiffs’ pending motion for approval of a notice program (ECF No. 2729-1) and Plaintiffs’ pending motion for preliminary approval of the revised plan of distribution (ECF Nos. 2954-2957).¹

Consistent with Plaintiffs’ recent submission seeking preliminary approval of the revised plan of distribution (ECF No. 2957, p. 1), Plaintiffs are respectfully submitting herewith amended versions of the proposed Notice, Summary Notice and Proof of Claim form. The notices and claim form have been updated to reflect, among other things, this Court’s rulings since Plaintiffs originally filed the notices and claim form on September 7, 2018 and to reflect the details of the revised plan of distribution submitted on August 12, 2019.

The proposed amended Notice, Summary Notice and Proof of Claim form are attached hereto, respectively, as Exhibits 1, 2 and 3. To facilitate the Court’s review, attached as Exhibits 4, 5 and 6 are redlines of the proposed amended Notice, Summary Notice and Proof of Claim that reflect changes to the versions previously submitted on September 7, 2018. ECF No. 2729-10 (Summary Notice), ECF No. 2729-11 (Notice) and ECF No. 2729-12 (Proof of Claim).

¹ The six proposed settlements were reached between Plaintiffs, on behalf of themselves and the putative Class, and the following Defendants: (1) Bank of America Corporation and Bank of America, N.A. (collectively, “Bank of America”); (2) Barclays Bank plc (“Barclays”); (3) Citigroup Inc., Citibank, N.A., and Citigroup Global Markets Inc. (collectively, “Citi”); (4) Deutsche Bank AG, Deutsche Bank Securities Inc., and DB Group Services (UK) Limited (collectively, “Deutsche Bank”); (5) HSBC Bank plc (“HSBC”); and (6) JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. (collectively, “JPMorgan”).

Plaintiffs respectfully request that the Court approve the form of the proposed amended Notice, Summary Notice and Proof of Claim form attached hereto as Exhibits 1, 2 and 3. *See* ECF No. 2729-3, pp. 11-14 (the Notice, Summary Notice and Proof of Claim comply with Rule 23(c)(2)(B) and comport with due process).

As always, we look forward to any comments or questions Your Honor might have.

Respectfully submitted,

/s/ Christopher Lovell
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